

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

CHAPTER 7
CASE NO. 16-10026

In Re:)	MOTION TO EXTEND
)	DEADLINE TO OBJECT
)	DEBTOR'S DISCHARGE
Edgar Vasquez de Miranda Neto,)	AND CHALLENGE
Debtor)	DISCHARGEABILITY OF
)	CERTAIN DEBTS

Pursuant to Federal Rules of Bankruptcy Procedure 4004(b)(1) and 4007(c), creditor Shamrock Finance LLC ("Shamrock") hereby moves this Court for an Order extending the current Monday, May 9, 2016 deadline to object to the debtor, Edgar Vasquez de Miranda Neto ("Debtor") discharge and/or challenge the dischargeability of certain debts of the Debtor for approximately sixty (60) days, or other reasonable period of time to be determined by this Court, which would make Friday, July 8, 2016 the new deadline. In further support of this Motion, Shamrock states as follows:

1. On January 6, 2016 the Debtor filed his petition for relief under Chapter 7 of the Bankruptcy Code;
2. On January 7, 2016 Mark G. DeGiacomo (the "Trustee") was appointed Chapter 7 Trustee in this matter;
3. On March 10, 2016, the Trustee conducted the Meeting of Creditors required as required by 11 U.S.C. § 341;
4. The creditors' meeting has since been continued and re-scheduled twice more, with the current meeting date set for May 11, 2016;
5. On April 21, 2016, creditor, Romildo C. de Souza ("creditor"), filed his Motion for

2004 Examination (Docket No. 45) and Motion to Continue Objection Deadline (Docket No. 46) which the creditor stated therein that he requires additional time to get his motion approved, conduct a Rule 2004 examination, and gather the necessary information in time to file an objection to discharge (or a challenge to dischargeability of the debt owed to him) by that date;

6. On April 28, 2016, this Court entered an Order to Show Cause compelling the Debtor to show cause in writing by May 13, 2016 why the case should not be closed without a discharge for the failure to comply with the discharge requirements;
7. Fed. R. Bankr. P. 4004(b)(1) provides that “[o]n motion of any party in interest, after notice and hearing, the court may for cause extend the time to object to discharge. Except as provided in subdivision (b)(2), the motion shall be filed before the time has expired.” Likewise, the time for filing a Complaint objecting to the dischargeability of a debtor’s debts may be extended pursuant to Fed. R. Bankr. P. 4007(c);
8. Based upon the Debtor’s testimony at the initial 341 Meeting of Creditors and information obtained through its own independent investigation, Shamrock may also seek to examine the Debtor at a Rule 2004 examination;
9. In light of these circumstances, Shamrock believes that sufficient cause exists to extend for approximately sixty (60) days from the current May 9, 2016 deadline to object to Debtor’s discharge and to challenge the dischargeability of certain debts which makes Friday, July 8, 2016 the new deadline to object, or other reasonable time period as determined by this Court.

WHEREFORE Shamrock respectfully requests that this Honorable Court grant this Motion, extend the Monday, May 9, 2016 deadline to object for approximately sixty (60) days which makes Friday, July 8, 2016 the new deadline to object Debtor's discharge and to challenge the dischargeability of certain debts and grant such other relief as the Court deems just and appropriate.

Respectfully submitted,
SHAMROCK FINANCE LLC
By its attorney,

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Dated: May 3, 2016